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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUTH APPLE,

Plaintiff

vs.

CSAA GENERAL INSURANCE
COMPANY dba AAA INSURANCE;
CSAA INSURANCE EXCHANGE dba
AAA INSURANCE, inclusive,

Defendants

CASE NO.: 2:19-cv-01093-RFB-DJA

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND JOINT PRETRIAL
ORDER DEADLINE (FIRST REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-captioned matter. Good cause exists to extend the remaining deadline for the reasons explained below.

A. Reasons For the Extension

On June 8, 2021 (ECF 65), A Stipulation and Order to Extend Discovery Deadline Dates (Sixth Request) was signed and filed by the court ordering that within (30) days of filing dispositive motions, the Joint Pre-Trial Order must be submitted by September 22, 2021. The parties have been reviewing exhibits and deposition transcripts for the Joint Pre-Trial Order;

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1 however, there are 10 deposition transcripts being reviewed as well as voluminous records that
 2 have been disclosed. Additionally, the parties are discussing setting a private mediation with
 3 Judge Togliotti, which would not occur until November or December 2021 due to availability.
 4 Recently, counsel conferred regarding an extension of time to submit the parties' Joint Pretrial
 5 Order in this case. Counsel agree that additional time is needed in order to fully and properly
 6 identify portions of deposition transcripts intended to be used at the time of trial, provide
 7 objections regarding the same, as well as schedule a mediation in hopes of resolution before trial.

8 As such, the September 22, 2021 deadline should be extended so that the parties are able
 9 to provide a proper Joint Pretrial Order to the Court.

10 **B. Proposed Revised Pretrial Order Schedule**

11 The Joint Pretrial Order is due on September 22, 2021 and the parties are requesting the
 12 deadline be moved to December 22, 2021. This request for an extension of time is not sought for
 13 any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the
 14 purpose of allowing sufficient time to adequately prepare their pretrial order to include portions of
 15 depositions in which the parties intend to use at the time of trial and mediate. The parties
 16 respectfully submit that the reasons set forth above constitute compelling reasons and good cause
 17 for the short extension.

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WHEREFORE, the parties respectfully request that this Court extend the deadline for submitting their Joint Pretrial Order from the current deadline as outlined above.

DATED this 17th day of September, 2021.

DATED this 19th day of September, 2021.

MAINOR WIRTH, LLP

**MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH, LLP**

/s/ Breanna Hartmann

/s/ Jonathan Carlson


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ORDER

IT IS SO ORDERED.

DATED this 16th day of October, 2021.


RICHARD E. BOULWARE, II
United States District Court

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